

## Meyer, Ioana C (CIV)

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**From:** Speth, Charles <Charles.Speth@wilmerhale.com>  
**Sent:** Tuesday, October 29, 2024 3:16 PM  
**To:** Meyer, Ioana C (CIV)  
**Cc:** Gostin, Isley; Tuttle Newman, Jake; Bertoni, Daniel (CIV); Adair, Thomas (CIV)  
**Subject:** [EXTERNAL] RE: Deposition Scheduling

Hi Ioana,

Thank you for your emails. We are still working to get dates for the URS witnesses and hope to provide you some proposals this week.

Given the schedule change, we would like to depose Bauer and Franklin in Dayton either the weeks of January 13 or 20. We would like to depose Feinberg and Davis the weeks of February 3 or February 10. Can you please let us know their availability during those periods? Also, you had previously indicated that Mr. Giardina was only available in December the week before Christmas. It sounds like his availability has changed and he is now only available in December from December 1-10? If so, would Thursday December 5 work for his deposition? Please let us know whether New York City works as a location in the event we proceed in-person.

We'd also like to note that we expect to do some amount of direct examination of any URS witness that is deposed, including Mr. Blunt, Ms. Hamilton, and Mr. Lowe, and we plan to continue those depositions to a second day to the extent such examination is not concluded on the first day. We also wanted to note that, if the government elects to proceed remotely for a deposition, counsel for URS may nonetheless choose to attend in person, with the understanding that the standard rules with respect to limitations on witness communications during depositions apply. We, of course, have a reciprocal expectation if we elect to proceed virtually and you elect to attend a deposition in person. As to your question regarding our representation of former URS witnesses, we represent numerous former employees in this matter. If there are former employees about which you have a question, please let us know.

Best,  
Charlie

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**From:** Meyer, Ioana C (CIV) <[Ioana.C.Meyer@usdoj.gov](mailto:Ioana.C.Meyer@usdoj.gov)>  
**Sent:** Monday, October 28, 2024 3:22 PM  
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**Subject:** Deposition Scheduling

**EXTERNAL SENDER**

Hi Charlie,

I'm checking in on scheduling the additional depositions. It looks like we're still waiting on proposed dates for the following witnesses:

- Arthur Desrosiers

- Kevin Collins
- Michael Gavin
- Dan Macias
- Keith Stone
- AECOM 30(b)(6)

We also proposed some dates for the following witnesses, have you had a chance to determine whether these dates would work?

- Wendy Bauer
  - Week of November 18
- Derrick Franklin
  - Week of November 18
- Hugh Davis
  - December 17
- Steve Feinberg
  - December 12
- Paul Giardina
  - Between Dec 1-10, or starting in January

We are working on getting you dates for the EPA and KAPL 30(b)(6) – although I believe we are still waiting on the KAPL 30(b)(6) notice.

Thanks,

**Ioana C. Meyer**

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